Shea N. Palavan (State Bar No. 339543) shea@houstonip.com PALAVAN MOORE 2 PALAVAN & MOORE, PLLC 3 4590 MacArthur Boulevard, Suite 500 Newport Beach, California 92660 Telephone: (832) 800-4133 4 Facsimile: (855) PALAVAN (725-2826) 5 Attorneys for Plaintiff, 6 DIGITÁL VERIFICATION SYSTEMS, LLC 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA 10 OAKLAND DIVISION 11 12 Case No. 4:21-CV-08529-YGR DIGITAL VERIFICATION SYSTEMS, LLC, JOINT NOTICE OF SETTLEMENT 13 AND STIPULATION OF DISMISSAL Plaintiff, 14 **JURY TRIAL DEMANDED** V. 15 **Thursday, May 24, 2022** Date: FOXIT SOFTWARE, INC., 16 Time: 2:00 p.m. 1. 4th Floor Courtroom: Defendant. 17 Hon. Yvonne G. Rogers Judge: 18 19 Plaintiff, Digital Verification Systems, LLC (hereinafter, "DVS" or "Plaintiff"), and 20 Defendant, Foxit Software, Inc. (hereinafter, "Foxit" or "Defendant"), by and through their 21 respective undersigned counsel, hereby respectfully file this Joint Notice of Settlement and 22 Stipulation of Dismissal, and, in support thereof, state as follows: 23 24 25 26 27 28

The matter has been settled. Therefore, including pursuant to FEDERAL RULE OF CIVIL 1 PROCEDURE 41(a)(1)(A)(ii), the parties hereby respectfully stipulate to the dismissal of this 2 3 case with prejudice, including all claims of Plaintiff and all claims of Defendant, with each 4 party to bear its own costs and expenses. 5 Dated: June 8, 2022 Respectfully submitted, 6 PALAVAN & MOORE, PLLC 7 /s/ Shea N. Palavan Shea N. Palavan (State Bar No. 339543) 4590 MacArthur Boulevard, Suite 500 8 Newport Beach, California 92660 Telephone: (832) 303-0704 Facsimile: (855) PALAVAN (725-2826) 9 10 shea@houstonip.com 11 Jay Johnson (Admitted *Pro Hac Vice*) jay@kjpllc.com 12 KIŽŽIA JÖHNSON, PLLC 1910 Pacific Avenue, Suite 13000 13 Dallas, Texas 75201 Telephone: (214) 451-0164 14 Facsimile: (214) 451-0165 15 Stephen Lobbin (State Bar No. 181195) sml@smlavvocati.com 16 SML AVVOCATI P.C. 888 Prospect Street, Suite 200 La Jolla, California 92037 17 Telephone: (949) 636-1391 18 Attorneys for Plaintiff, DIGITAL VERIFICATION SYSTEMS, 19 LLC 20 21 /s/ Rachael D. Lamkin Rachael D. Lamkin 22 LAMKIN IP DEFENSE One Harbor Drive, Suite 300 23 Sausalito, California 95965 RDL@LamkinIPDefense.com 24 916.747.6091 25 Attorney(s) for Defendant, FOXIT SOFTWARE, INC. 26 27 28

## **CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule 5.5, and this Court's Rules, Orders, and Procedures. Any other counsel of record will be served by electronic mail, facsimile transmission, and/or first-class mail on this same date.

Dated: June 8, 2022 /s/ S

/s/ Shea N. Palavan Shea N. Palavan

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